tively promoting a rational Indian policy he became the object of unmeasured abuse by many good persons who professed aims like his. In the summer of 1879 arose the agitation about the Poncas, which continued both to vex and to amuse the Secretary while he remained in office* The Poncas were a small, peaceable tribe of Indians who had long lived in quiet upon their reservation in southeastern Dakota. Prior to the administration of President Hayes it became necessary to readjust the boundaries of the Sioux reservation, in order to leave the Black Hills open to the influx of miners. To give satisfaction to both the Sioux and the gold seekers was a difficult task, and in the absorption of its work in this respect, Congress overlooked the Poncas altogether, and assigned their land to the Sioux. When the error was discovered, it seemed hazardous to reopen the matter so far as the Sioux were concerned, and accordingly it was determined to remove the Poncas to a new reservation in the Indian Territory. The removal was effected just as Mr. Schurz took office, and the manner of it, like the action which made it necessary, was shockingly unjust to the poor Indians. Many of them died as a result of the unfavorable conditions on the new reservation, and in the spring of 1879 some of them left their new home and undertook to return to their former abode. When this enterprise was checked by the action of federal troops, a rather startling change was

effected in the situation by the action of the federal district court in Omaha. Judge Dundy granted a writ of habeas corpus on an application in behalf of one of the Indians named Standing Bear, and set him free. The intrinsic justice of the action in this particular case could hardly be disputed. As to the point of law, however, the judge's decision opened up an alarming vista of future complications in the administration of Indian affairs. Restless braves and ambitious